
From: allisondan52
Sent: Thursday, February 13, 2014 11:42 PM
To: CEQA Guidelines
Subject: LOS Alternatives

Thank you for the opportunity to comment on the Preliminary Evaluation of Alternative Methods of Transportation Analysis.

Section VI: Goals and Objectives

I agree with these objectives. Though this is essentially a bullet list and not a numbered list, if there is any implication of priority, I believe that health should be moved up to position two, directly after environmental effect.

Section VII: Alternative Criteria

I am opposed to use of Multimodal Level of Service (MMLOS). I have tried to use this tool in analyzing several projects, and have found that it consistently does not produce an answer appropriate to environmental and livability concerns. It is even more of a black box than LOS, garbage in, garbage out.

Of the other options, I like the simplicity of VMT. I believe that it should be implemented, and then re-evaluated in about five years to determine if some refinement is necessary. It would be infinitely superior to LOS.

Section VIII: Questions

1b. For pedestrians, one of the most important criteria for walkability is the distance between safe crossings of the roadway. This is so important that it must be addressed in the CEQA analysis. Too many analyses, including those within the current understanding of the complete streets concept, emphasize movement along a corridor, and ignore movement across a corridor. Any project which increases the width of a roadway, the speed of traffic, or the distance between safe crossings is an unacceptable impact. Of course the ultimate goal for streets is that all crossings at any location are safe because traffic speeds and volumes have been reduced enough to make it safe.

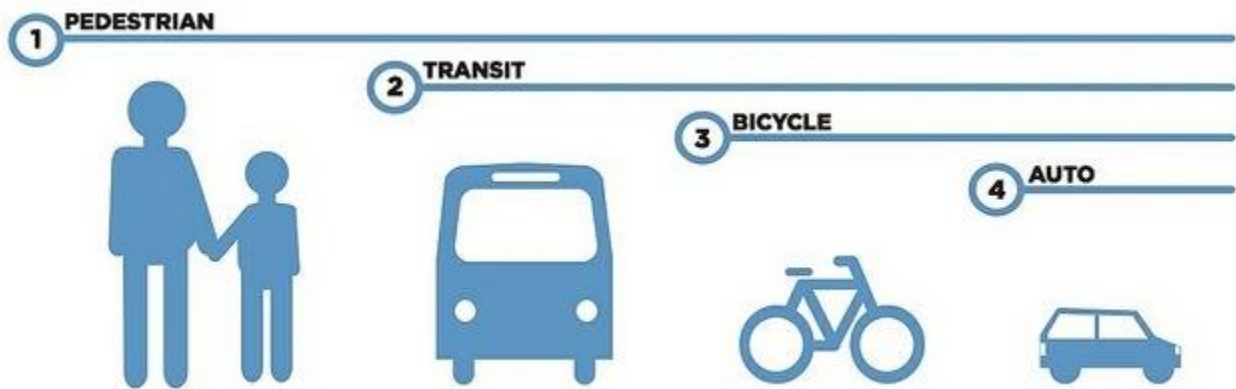
1c. Existing design guidelines are in fact not acceptable for safety. The California Highway Design Manual is focused on freeways and arterials, and is completely inappropriate for application to streets, but yet Caltrans and local transportation agencies routinely apply those designs to what should be streets and not roads. The result is a proliferation of what Charles Marohn of Strong Towns calls "stroads", roadways which should have served as streets for accessibility and livability, but instead only serve mobility and do not do even that very well.

3. Parking should be considered in the criteria, but it is not clear to me how to best do that. Parking that is free or offered below market rate clearly has a negative environmental impact, however, parking is not in and of itself a bad thing, and on-street parking can in fact result in a significant traffic calming benefit (therefore less pollution, less noise, and better safety). Parking must be considered in such a way that developments, whether infill or greenfields, are not

encouraged to provide free or below market rate parking. At the same time, removal of parking, if necessary to increase the accessibility and safety of transit, walking, and bicycling, should not be considered a negative environmental impact. There is a delicate balance here, and I don't know how to accomplish it, but it should be addressed.

Roadways with a high LOS ranking, with free flowing traffic, are economically dead. We have long known this, but the use of LOS in transportation and land use planning has led directly to economically dead roadways, long after we knew better. The sooner LOS disappears, the better off we will be, environmentally and economically.

Whatever criteria is used, it should result in transportation decisions and priorities that reflect a high quality environment and a high level of livability. That is expressed very well in the graphic I've included below, from the Chicago Department of Transportation Complete Streets document. Any criteria that does not result in this mix is wrong.



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Dan Allison